

Complainant

Daniel G. Hinnenkamp
Treasurer, District 43 Democratic-NPL
1003 S. 24th St.
Grand Forks, ND 58201

SENSITIVE

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2015 APR 15 P 12:41

Respondents

Sen. Lonnie Laffen
Laffen 4 Senate
Leo Ledohowski
Gov. Jack Dalrymple
Dalrymple for Governor
John Pfeffer
ND Oil PAC
Dean Potter

MUR # 6931

Facts

- According to the North Dakota secretary of state's website, Sen. Laffen reported receiving on September 12, 2010 a \$1,000 contribution from Leo Ledohowski, whose address is reported as 930 Jefferson Ave., Winnipeg, MB R2P 1W1, the same address as the corporate headquarters for Canad Inns.¹
- According to the North Dakota secretary of state's website, Sen. Laffen reported receiving on October 25, 2014 a \$1,945.42 contribution from Mr. Ledohowski.²
- According to the *Fargo Forum*, Sen. Laffen asked the secretary of state's office whether a contribution from a foreign national was allowed. Sen. Laffen later stated that he was told by the secretary of state that the contribution from a foreign national was "perfectly legal," and that he "checked with the North Dakota Secretary of State a long time ago, and there's nothing wrong with accepting donations from any country."³
- According to the *Fargo Forum*, Secretary of State Al Jaeger stated, "It is [the secretary of state's] long-standing understanding that the federal laws under the FEC apply to federal candidates and do not apply to in-state non-federal candidates[.]"⁴
- According to the *Fargo Forum*, Cindy Carswell, vice president of corporate identity and community relations for the business associated with Mr. Ledohowski's reported address, stated that Mr. "Ledohowski is a Canadian citizen."⁵

¹ Laffen 4 Senate, Year-End Statement, January 12, 2011, available at

² Laffen 4 Senate, 48-Hour Statement, October 25, 2014, available at

: Laffen 4 Senate, Year-End Statement.

January 15, 2015, available at

³ John Hageman, Grand Forks senator defends Canadian campaign contribution, *Fargo Forum*, March 17, 2015, available at

(attached as Exhibit A).

⁴ *Id.*

⁵ *Id.*

- According to the North Dakota secretary of state's website, Gov. Dalrymple also reported receiving on July 11, 2012 a \$2,500 contribution from Mr. Ledohowski.⁶
- According to the North Dakota secretary of state's website, Gov. Dalrymple reported receiving on October 15, 2012 a \$1,000 contribution from John Pfeffer, whose address is listed as 12 Alexander Square, London, OT SW32AY.⁷
- According to the North Dakota secretary of state's website, ND Oil PAC reported receiving on May 7, 2014 a \$500 contribution from Dean Potter, whose address is reported as 1-624 Dehavilland Way, Calgary T32358, AB32358.⁸

Relevant Statutes and Regulations

- The FECA and FEC statutes and regulations prohibit a person from "solicit[ing], accept[ing], or receiv[ing] a contribution or donation . . . from a foreign national."⁹ A "foreign national" is defined as "an individual who is not a citizen of the United States . . ."¹⁰
- The FECA and FEC statutes and regulations prohibit a foreign national, directly or indirectly, from making a contribution or donation of money in connection with a "Federal, State, or local election[.]"¹¹ A "foreign national" is defined as "an individual who is not a citizen of the United States . . ."¹²

Verification

Daniel G. Hinnenkamp
Daniel G. Hinnenkamp

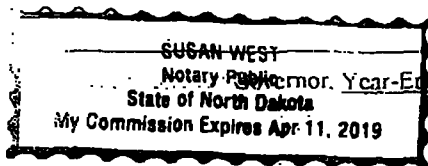
4-2-2015
Date

Signed and sworn to before me this 2 th day of April, 2015.

State of North Dakota
County of Grand Forks

Susan West
Notary Public

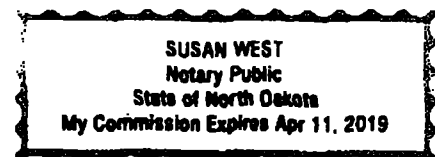
The foregoing instrument was
acknowledged before me this 2nd day of
April, 2015, by
Daniel G. Hinnenkamp
My Commission
Expires:



Susan West
Notary Public

⁶ *Id.*
⁷ ND Oil PAC, Year-End Statement, January 29, 2015, available at

⁸ 52 U.S.C. § 30121(a)(2).
⁹ 52 U.S.C. § 30121(b)(2).
¹⁰ 52 U.S.C. § 30121(a)(1)(A); 11 CFR 110.20(b) (emphasis added).
¹² *Supra* note 9; 11 C.F.R. 110.20(3).





Grand Forks senator defends Canadian campaign contribution

By [Laurie Rasmussen](#) on Mar 17, 2015 at 6:41 p.m.



GRAND FORKS – A Grand Forks state senator reported campaign contributions from a Canadian businessman during the last election cycle, a disclosure that was mentioned on the House floor Monday during a discussion on ethics.

Lonnie Laffen, R-Grand Forks, reported a \$1,945 contribution from Leo Ledohowski in October in the run-up to his re-election bid. Ledohowski is the head of the Winnipeg-based Canad Inns hotel chain, which has a location attached to the Alerus Center in Grand Forks.

Laffen told the Herald Tuesday morning that he had checked with the North Dakota Secretary of State's office, which said the contribution would be allowed. Republican Secretary of State Al Jaeger wrote in an email to the Herald Monday afternoon that he's not aware of anything in state law that would prevent a legislator from accepting a foreign contribution.

"It's perfectly legal," Laffen said. "I checked with the North Dakota Secretary of State a long time ago, and there's nothing wrong with accepting donations from any country."

Still, a Federal Election Commission guide states that federal law prohibits foreign nationals from making contributions or donations in connection with a federal, state or local election. Ledohowski's address in the North Dakota Secretary of State campaign contribution database is the Canad Inns

headquarters in Winnipeg.

"It is our long-standing understanding that the federal laws under the FEC apply to federal candidates and do not apply to in-state non-federal candidates," Jaeger wrote in an email.

Cindy Carswell, vice president of corporate identity and community relations for Canad Inns, said Ledohowski was unavailable for comment Tuesday, but said it's their understanding that the contribution "is quite allowed under the laws." She said Ledohowski is a Canadian citizen.

Ethics commission

The contribution first came to public light during a speech by Rep. Corey Mock, D-Grand Forks, on the House floor Monday. He was attempting to rally support for a resolution that would have let voters decide whether to create in the state's constitution an ethics commission that could examine campaign finance and initiate investigations of legislators and other statewide elected officials.

"And even one of our colleagues, not in this chamber, received nearly \$2,000 in foreign campaign contributions in the last election cycle," Mock said on the House floor. "What are we doing that addresses the perception of ethical misconduct? The fact that we don't have a commission or a committee means that we cannot clear any action that could be perceived as unethical."

The House ultimately voted down the legislation.

While Mock did not name the legislator who received the campaign contribution on the floor, he confirmed in an interview with the Herald that Laffen was the senator he had in mind.

"That's the one that I was aware of," Mock told the Herald.

Ledohowski's contribution was first pointed out by Rob Port of SayAnythingBlog.com in a post about Mock's speech.

Mock added that he didn't mean to suggest that the contribution would be illegal, but predicted the next Legislature may take up laws concerning foreign contributions.

Laffen, who is president and CEO of the Grand Forks-based firm JLG Architects, described Ledohowski as a "friend from work." JLG was the architect on the Grand Forks Canad Inns project, according to Herald archives.

Laffen said he wasn't sure if Ledohowski had dual citizenship, which Mock said may make Ledohowski exempt from the federal law.

Laffen was first elected to the state Senate in 2010 and was re-elected to represent District 43 with 53 percent of the vote in November.

Laffen is opposed to the ethics commission bill, arguing that it's a statutory issue rather than a constitutional one. He said the allegations about the Canadian contribution also illustrate problems with an ethics commission.

"That would be the problem with an ethics commission, is looking for wrongdoing," Laffen said.

**North Dakota Secretary of State
Campaign Finance - Search By Report
2012 Year End Candidate Committee**

Page: 1

Name: Dalrymple for Governor
Registration Date: 01/04/2012
Address 1: PO Box 952
City, State Zip: Bismarck, ND 58502
Telephone: 701.250.7001

Candidate: Jack Dalrymple
Office Running For: Governor and Lt. Governor
Political Party: Republican Party

Agent Name: Ms. Amy C. Lunde
Agent Title or Position: Campaign Manager
Agent Telephone: 701.250.7001

Candidate Name: Jack Dalrymple
Person Completing Report: Ryan Laffen
Date Report Filed: 01/30/2013
Total Cash On Hand at Start of Reporting Period: \$709,997.97
Total Cash On Hand at Close of Reporting Period: \$138,208.92
Total Contributions Greater Than 200: \$1,383,984.00
Total Contributions Less Than or Equal to 200: \$1,385,664.00
Total of All Contributions: \$2,769,668.00

964 Contributions found

3M PAC
3-M 12335 N 53rd St
Stillwater, MN 55082
Date / Amount: 11/20/2012 \$650.00

ADM PAC
PO Box 1470
Deatur, IL 62525
Date / Amount: 05/17/2012 \$2,000.00

AGC of North Dakota PAC
PO Box 1624
Bismarck, ND 58502
Date / Amount: 09/10/2012 \$1,000.00

AT&T Mobility LLC Employee PAC
1410 Telford Drive
Liberty, MO 64068
Date / Amount: 08/14/2012 \$500.00

Aas, Dave & Kathleen
2600 23 St SW
Minot, ND 58701
Date / Amount: 08/01/2012 \$450.00

Aas, Lynn
2905 Elk Dr Apt 320
Minot, ND 58701
Date / Amount: 02/10/2012 \$1,000.00

Aberdale, Andrew
5 Stacy Way
Acton, MA 01720
Date / Amount: 06/05/2012 \$1,000.00

Ackley, Warren
PO Box 2043
Fargo, ND 58107
Occupation: Other
Employer: Global Development
PO Box 2043
Fargo, ND 58107
Date / Amount: 10/19/2012 \$5,000.00

Adams, Bev
611 13 1/2 Avenue East
West Fargo, ND 58078
Date / Amount: 07/16/2012 \$450.00

North Dakota Secretary of State
Campaign Finance - Search By Report
2012 Year End Candidate Committee

Page: 36

Larson, Carl
9519 80th St SE
Fullerton, ND 58441
Date / Amount: 10/22/2012 \$2,500.00

Larson, Frank
11686 River Rd
Valley City, ND 58072
Occupation: Professional
Employer: First Southwest Bank
11686 River Rd
Valley City, ND 58072
Date / Amount: 05/16/2012 \$5,000.00

Larson, Marvin
PO Box 97
Gilby, ND 58235
Date / Amount: 04/18/2012 \$255.00

Larson, Rodney
4418 Xerxes Avenue South
Minneapolis, MN 55410
Date / Amount: 07/15/2012 \$500.00

Larson, Rodney
7975 94th Ave SE
Fullerton, ND 58441
Date / Amount: 07/09/2012 \$500.00

Lash, Brian
46 Birmingham Pkwy
Boston, MA 02135
Date / Amount: 05/30/2012 \$2,000.00

Lauf, Jr., Robert
115 3rd Ave SE
Mayville, ND 58257
Date / Amount: 09/20/2012 \$415.00

Lawlor III, William
243 Warwick Road
Kenilworth, IL 60043
Date / Amount: 05/17/2012 \$1,000.00

Lawrence, Scott
204 East 29th Street
Sioux Falls, SD 57105
Date / Amount: 07/19/2012 \$500.00

Ledochowski, Leo
930 Jefferson Ave, Suite 301
Winnipeg, MB 211
Date / Amount: 07/11/2012 \$2,500.00

Lee, Bill
3818 Fairview Drive
Grand Forks, ND 58201
Date / Amount: 10/01/2012 \$250.00

Lee, Judy
1822 Brentwood Court
West Fargo, ND 58078
Date / Amount: 10/02/2012 \$300.00

Leavers, Robert
302 16 Avenue SE
Devils Lake, ND 58301
Date / Amount: 09/10/2012 \$1,000.00

Lefor, Mike
1952 3 Street West
Dickinson, ND 58601
Date / Amount: 04/19/2012 \$250.00

North Dakota Secretary of State
Campaign Finance - Search By Report
2012 Year End Candidate Committee

Page: 50

Pearce, Harry
455 Wishbone Dr
Bloomfield Hills, MI 48304
Date / Amount: 11/06/2012 \$1,000.00

Pearson, Frank
309 Schnell Dr
Oxbow, ND 58047
Date / Amount: 10/20/2012 \$250.00

Pefanis, Henry
4103 University Blvd
Houston, TX 77005
Date / Amount: 09/21/2012 \$2,500.00

Peltier, Joe
3420 Waterford Dr
Fargo, ND 58104
Date / Amount: 09/19/2012 \$250.00

Perica, John
1423 10 Ave E Unit 305
West Fargo, ND 58078
Date / Amount: 07/15/2012 \$225.00

Peske, Barb
2808 Domino Drive
Bismarck, ND 58503
Date / Amount: 08/23/2012 \$225.00

Petersen, Gary
PO Box 787
New Town, ND 58763
Date / Amount: 08/23/2012 \$500.00

Petersen, Terry
2079 4th St SW
Washburn, ND 58577
Date / Amount: 09/19/2012 \$500.00

Peterson, Andy & Patti
539 Brandon Place, #203
Bismarck, ND 58503
Date / Amount: 06/12/2012 \$450.00

Peterson, David
PO Box 2436
Williston, ND 58802
Date / Amount: 06/26/2012 \$820.00

Peterson, Duane
1504 Glacial Dr
Minot, ND 58703
Date / Amount: 05/11/2012 \$550.00

Peterson, Julie
3104 164 Ave SE
Harwood, ND 58042
Date / Amount: 10/01/2012 \$1,000.00

Peterson, Mark
300 Linden Ln
Bismarck, ND 58503
Date / Amount: 09/06/2012 \$500.00

Pfeffer, John
12 Alexander Square
London, OT SW32AY
Date / Amount: 10/15/2012 \$1,000.00

Pfeifle, Myron
2427 Sierra Circle
Bismarck, ND 58503
Date / Amount: 04/13/2012 \$1,000.00
